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January 29, 2015

Mr. Brian Power Area Environmental Manager Republic Services, Inc. 13570 St. Charles Rock Road Bridgeton, MO 63044

RE:

Temperature Monitoring Probe Installation Plan, Bridgeton Landfill, L.L.C., Permit Number 0118912, St. Louis County

Dear Mr. Power:

This letter is in response to a work plan submittal titled "Fourteen Additional Temperature Monitoring Probes", dated December 31, 2014 and received by the Missouri Department of Natural Resources' Solid Waste Management Program (SWMP) via e-mail on January 2, 2015. The submittal consisted of a two page cover letter from Bridgeton Landfill, LLC, and a set of six (6) plan sheets prepared by Feezor Engineering, Inc. for Bridgeton Landfill, LLC, dated December, 2014. The submittal seeks approval for installation of a total of fourteen (14) proposed temperature monitoring probes (TMPs). Nine (9) of the TMPs were previously approved by the department on November 15, 2014 and on January 16, 2015 approval was granted for the relocation of TMPs -24 and -26. This letter is in reference only to the remaining five TMPs -3R, 4R, -30, -31 and -32.

This letter provides the department's approval for immediate installation of TMPs -3R and -4R to be located in the Neck Area of the Bridgeton Landfill with the Conditions stated below. Additional information is required to be submitted to the SWMP prior to commencement of drilling on TMPs -30, -31 and -32. The submittal was reviewed in accordance with the Missouri Solid Waste Management Law and regulations.

The SWMP hereby <u>approves</u> the installation of TMPs -3R and -4R at the Bridgeton Sanitary Landfill with the following conditions. Compliance with these conditions will, in part, determine compliance with Solid Waste Disposal Area Permit Number 0118912.

## **CONDITIONS:**

1. The new TMPs must allow for monitoring of temperatures in the same range as the currently installed and monitored TMPs which incorporate a type T thermocouple with an approximate temperature range of -300° F to 600° F.



- 2. Plan sheet number 004, shows installation of thermocouple switch boxes. Please ensure that the "boxes" are placed in a timely fashion to ensure the integrity of the thermocouple wires.
- 3. Prior to the department's approval to commence drilling of TMPs -30, -31 and -32, the permitted facility must provide an abandonment plan that details specifics of how an incomplete TMP will be abandoned should completion prove infeasible. At a minimum, this plan must address management of odors, superheated liquids, elevated temperatures and excess pressure resulting in the potential risk for leachate geysering. Further, any ejected liquids must be properly contained and managed.

The following documents were reviewed and are hereby incorporated into permit number 0118912:

## **DOCUMENT:**

"Fourteen Additional Temperature Monitoring Probes", dated December 31, 2014 and received by the Missouri Department of Natural Resources' Solid Waste Management Program (SWMP) via email on January 2, 2015. The submittal consisted of a two page cover letter from Bridgeton Landfill, LLC, and a set of six (6) plan sheets prepared by Feezor Engineering, Inc. for Bridgeton Landfill, LLC, dated December, 2014.

This approval is not to be construed as compliance with any existing federal or state environmental laws; nor should this be construed as a waiver for any other regulatory requirements. This approval is not to be construed as compliance with any existing local permitting or zoning ordinances; nor does it supersede any local permitting and/or zoning requirements.

The department reserves the right to revoke, suspend, or modify this approval and/or Permit Number 0118912 after due notice, if the permit holder fails to maintain the facility in compliance with the Missouri Solid Waste Management Law and regulations, the terms and conditions of the permit, and the approved engineering plans and specifications.

We appreciate your continued cooperation in this matter. If you have any questions or comments, please contact me at (573) 526-3940 or at P.O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM

Charlene S. Fitch, P.E. Chief, Engineering Section

CSF:jbl

c: Mr. Bill Beck, Lathrop & Gage

Mr. Larry Lehman, Chief, Compliance/Enforcement Section, SWMP

Mr. Joe Trunko, St. Louis Regional Office

Ms. Brenda Ardrey, Chief, Operations Section, SWMP

Mr. Tom Phillips, Attorney General's Office

Daniel Feezor, P.E., Feezor Engineering, Inc.